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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12
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14 UNITED STATES OF AMERICA,)	NO. CR 21-00192 WHO
)	
15 Plaintiff,)	MOTION TO UNSEAL
)	
16 v.)	
)	
17 WILLIAM GILMARTIN, III,)	
)	
18 Defendant.)	
)	

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20 On May 27, 2021, defendant William GILMARTIN pled guilty before this Court to a one-count
21 Information charging him with Conspiracy to Commit Honest Services Wire Fraud. *Dkt 39, 40*. At the
22 request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea,
23 was filed under seal because at the time the government's investigation of the facts underlying defendant
24 GILMARTIN's conduct was ongoing. There is no longer an investigative need by the government to
25 keep defendant GILMARTIN's factual admissions in Exhibit A under seal. The undersigned Assistant
26 U.S. Attorney consulted with counsel for defendant GILMARTIN, who has no objection to unsealing
27 Exhibit A to the Plea Agreement.

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1 Therefore, the government respectfully requests that this Court order that Exhibit A to defendant
2 GILMARTIN's plea agreement be unsealed.


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5 THOMAS A. COLTHURST
6 Attorney for the United States

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8 Dated: June 7, 2023

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10 /s/ David J. Ward
11 DAVID J. WARD
12 Assistant United States Attorney

13 For good cause shown, it is **SO ORDERED**.

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15 Dated: June 9, 2023

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17 
18 HONORABLE WILLIAM H. ORRICK
19 United States District Court Judge
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